

# EXHIBIT A

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**Via Email**

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Re: *Seagen Inc. v. Daiichi Sankyo Co., Ltd.*, Case No. 2:20-cv-00337-JRG (E.D. Tex.)

Counsel:

Seagen requests that DSC produce the following categories of documents relevant to claims or defenses in this litigation immediately pursuant to Section 3(b) of the Discovery Order. (Dkt. 51).

50. All documents produced by DSC in *Seagen Inc. v. Daiichi Sankyo Co., Ltd.*, American Arbitration Association, No. 01-19-0004-0115 (Brown, Arb.), that relate to the structure of the linker used in DSC's ADCs, including DS-8201.
51. All documents produced by DSC in *Seagen Inc. v. Daiichi Sankyo Co., Ltd.*, American Arbitration Association, No. 01-19-0004-0115 (Brown, Arb.), that relate to the composition of the linker used in DSC's ADCs, including DS-8201.
52. All documents produced by DSC in *Seagen Inc. v. Daiichi Sankyo Co., Ltd.*, American Arbitration Association, No. 01-19-0004-0115 (Brown, Arb.), that relate to the development of the linker used in DSC's ADCs, including DS-8201.

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53. The transcript of the deposition taken of Dalton King in *Seagen Inc. v. Daiichi Sankyo Co., Ltd.*, American Arbitration Association, No. 01-19-0004-0115 (Brown, Arb.).
54. The witness statements submitted by Yuki Abe, Toshinori Agatsuma, Kimihisa Ichikawa, Yuji Kasuya, and Hiroyuki Naito in *Seagen Inc. v. Daiichi Sankyo Co., Ltd.*, American Arbitration Association, No. 01-19-0004-0115 (Brown, Arb.).
55. The transcripts of the evidentiary hearing of *Seagen Inc. v. Daiichi Sankyo Co., Ltd.*, American Arbitration Association, No. 01-19-0004-0115 (Brown, Arb.) relating to the examination of Dalton King, Yuki Abe, Toshinori Agatsuma, Kimihisa Ichikawa, Yuji Kasuya, and Hiroyuki Naito.

\* \* \*

The term “document(s)” means the documents and things within the broadest scope of the Federal Rules of Civil Procedure, including electronically stored information, data, code, materials stored in any media, and any other information stored magnetically, optically, or electronically.

“DSC” means Defendant Daiichi Sankyo Co., Ltd. as well as its predecessors in interest, successors, past and present corporate parents, subsidiaries, affiliates, unincorporated divisions, any organization in which that Daiichi Sankyo Co., Ltd. has a managing or controlling interest, and any person acting on behalf of Daiichi Sankyo Co., Ltd., including its agents, officers, directors, attorneys or agents thereof, representatives, employees, and consultants.

“Seagen” means Plaintiff Seagen Inc., formerly known as Seattle Genetics, Inc.

As to the form of this production, Seagen requests that it be produced in compliance with the Order Regarding E-Discovery, entered on March 11, 2021. (Dkt. No. 64-1.)

Sincerely,



Matthew A. Chivvis